

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In Re:	)	Case No. : 12-40934-659
	)	Chapter 13
Tamara L. Vinson,	)	
	)	Motion to Incur Debt
Debtor.	)	Response due: 04-27-15

**NOTICE OF FILING OF MOTION**

PLEASE TAKE NOTICE; ANY RESPONSIVE PLEADING IN OPPOSITION TO THIS MOTION MUST BE FILED IN WRITING NO LATER THAN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE OF THIS MOTION AS SHOWN ON THE CERTIFICATE OF SERVICE (see L.B.R. 9013-1B., 9161-1B.) THE RESPONSE MUST BE IMMEDIATELY SERVED UPON THE UNDERSIGNED AND UPON ALL ENTITIES DESCRIBED IN L.B.R. 9013-1A. THE COURT MAY GRANT THE MOTION WITHOUT FURTHER NOTICE TO ANY PARTY UPON EXPIRATION OF THE RESPONSIVE PERIOD IF NO RESPONSE IS FILED. IF A RESPONSE OR OBJECTION IS FILED, THE MOVANT SHALL SET THE MATTER FOR HEARING AND PROVIDE NOTICE THEREOF TO THE RESPONDENT AND ALL ENTITIES DESCRIBED IN L.B.R. 9013.1A.

**MOTION TO INCUR DEBT**

Debtor, Tamara Vinson, by and through her attorney, Steven K. Brown, hereby respectfully requests that this Court enter its Order approving the following proposed consumer debt for the reasons set forth below:

1. The debt for which the Court's approval is sought is a mortgage on residential real estate.
2. Debtor is currently renting her residence at a cost of \$600.00 per month.
3. Debtor wishes to purchase her own home.
4. Debtor proposes to borrow no more than \$94,087.00 and to pay a maximum of \$497.63 in principal and interest per month for 30 years. The total expected payment, including escrow, will be \$822.63. The expected interest rate on the proposed loan is 4.870% per annum. Debtor proposes to pay the debt outside the Chapter 13 Plan upon approval of the proposed financing by the Court. Debtor's mortgage application has been approved by New American Funding
5. While the total new mortgage payment, including escrow, would be more than her current rental payment, the proposed principal and interest payment is less than current rent, and purchasing a home would allow Debtor to build equity in her real property for future retirement purposes.
6. Debtor is filing her amended Schedules I and J showing her ability to make the mortgage payment outside the Plan.
7. This proposed loan will not adversely affect the amount of Debtors Chapter 13 Plan payments.

WHEREFORE and for the foregoing reasons, Debtor request the Court's approval of the proposed consumer debt.

The undersigned hereby certifies that a copy of the foregoing Notice and Motion were served upon the persons below by either electronic case notice or by first class mail, postage prepaid this 6th day of April, 2015.

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John V. LaBarge  
PO Box 430908  
Saint Louis MO 63143  
(ECF Notice)

Service by US Mail:

Tamara Vinson  
3915 Iowa Avenue Apartment A  
Saint Louis MO 63118

Account Resolution Corporation  
17600 Chesterfield Suite 201  
Chesterfield MO 63005

ACS  
PO Box 22724  
Long Beach CA 90801-5274

AES/PHEAA  
PO Box 8183  
Harrisburg PA 17105

American Education Services  
PO Box 2461  
Harrisburg PA 17105-2461

American InfoSource LP  
4515 North Santa Fe Avenue  
Oklahoma City OK 73118

Anheuser Busch CU  
1001 Lynch Street  
Saint Louis MO 63118

Ardmore Finance  
1015 Locust Street, Ste 740  
Saint Louis MO 63101

Asset Acceptance LLC  
PO Box 2036  
Warren MI 48090-2036

Associated Recovery Systems  
PO Box 469046  
Escondido CA 92046-9046

AT&T  
Bankruptcy Department  
PO Box 80517  
Charleston SC 29416-0517

Bank of America Home Loans  
Attn Bankruptcy  
7105 Corporate Drive  
TX2-983-03-02  
Plano TX 75024-4100

Bank of America NA  
Loss Recovery  
800 Market Street  
MO1-800-06-14  
Saint Louis MO 63101-2510

Budget Finance  
3717 S. Kingshighway  
Saint Louis MO 63109

Capital One Services, Inc  
C/O American InfoSource  
PO Box 54529  
Oklahoma City OK 73154-4529

CashNetUSA.com  
200 West Jackson Blvd 14th Floor  
Chicago IL 60606-6941

Chase Cardmember Services  
PO Box 15298  
Wilmington DE 19850-5298

Citibank  
Citicorp Credit Services  
7920 Northwest 110th Street  
Kansas City MO 64153

Dollars Today  
3317 B Mississippi Avenue  
East Saint Louis IL 62206

ECMC  
PO Box 75906  
Saint Paul MN 55175

FedLoan Servicing  
PO Box 69184  
Harrisburg PA 17106-9184

GE Capital Retail Bank  
Attn: Bankruptcy Department  
PO Box 103106  
Roswell GA 30076

Great Plains Specialty Finance  
DBA Check N Go  
9016 Overland Plaza  
Saint Louis MO 63114

Great Lakes Higher Education Corp  
2401 International Lane  
Madison WI 53704

Illinois Department of Revenue  
Bankruptcy Section  
PO Box 64338  
Chicago IL 60664-0338

Internal Revenue Service  
PO Box 7346  
Philadelphia PA 19101-7346

James Grudus Esq  
AT&T Services Inc  
One AT&T Way Room 3A218  
Bedminster NJ 07921

Kramer & Frank PC  
9300 Dielman Ind. Dr. Ste 100  
Saint Louis MO 63132

Loan Express  
3915 Mississippi Avenue  
East Saint Louis IL 62206

Manhattan Savings Bank  
C/O AFSA Data Corp  
501 Bleecker Street  
Utica NY 13501

Master Finance Corp  
1015 Locust Ave, Ste 732  
Saint Louis MO 63101

Midland Credit Management  
8875 Aero Drive Ste 200  
San Diego CA 92123

Missouri Department of Revenue  
General Counsel's Office  
PO Box 475  
Jefferson City MO 65105-0475

Missouri Payday Loans  
3717 S Kingshighway Blvd  
Saint Louis MO 63109

MSD  
Bankruptcy Department  
2350 Market Street  
Saint Louis MO 63103

National Capital Management  
8245 Tournament Drive Suite 230  
Memphis TN 38125

Oak Harbor Capital LLC  
C/O Weinstein and Riley PS  
2001 Western Avenue Suite 400  
Seattle WA 98121

Portfolio Recovery Associates  
PO Box 41067  
Norfolk VA 23541

Quantum3 Group LLC  
PO Box 788  
Kirkland WA 98083-0788

Sallie Mae  
PO Box 9500  
Wilkes Barre PA 18773-9500

SLUCare  
PO Box 18353M  
Saint Louis MO 63195-8353

Southwest Credit Systems  
4120 International Parkway Suite 1100  
Carrollton TX 75007-1958

Sun Loan  
9000 Saint Charles Rock Road  
Saint Louis MO 63114-4246

Surety Finance  
1250 Camp Jackson Road  
East Saint Louis IL 62206

TitleMax of Missouri, Inc.  
1311 North Grand Blvd  
Saint Louis MO 63106

TitleMax of Missouri, Inc.  
15 Bull Street Suite 200  
Savannah GA 31401

US Department of Education  
Direct Loan Servicing Center  
PO Box 65128  
Saint Paul MN 55165

Weinstein and Riley PS  
2001 Western Avenue Suite 400  
Seattle WA 98121

Wells Fargo Educational Finc  
301 E 58th Street N  
Sioux Falls SD 57104

WFNNB  
Bankruptcy Department  
PO Box 182125  
Columbus OH 43218-2125

ZestCash  
6636 Hollywood Blvd  
Los Angeles CA 90028